

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Television Systems)	MB Docket No. 87-268
and Their Impact Upon the)	
Existing Television Broadcast)	
Service)	
)	
To: The Commission		

PETITION FOR RECONSIDERATION

KWWL Television, Inc. ("KWWL"), licensee of KWWL(TV), Channel 7, and KWWL-DT, Channel 55, Waterloo, Iowa (Facility ID No. 593), by its attorneys and pursuant to Section 1.106 of the Commission's regulations, hereby petitions for reconsideration of Appendix B of the *Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking* in the above-captioned proceeding.¹ As the attached engineering statement describes, KWWL seeks modification to the technical parameters allotted to KWWL-DT in Appendix B.

Respectfully submitted,

KWWL Television, Inc.

_____/s/
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October 26, 2007

¹ *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, MB Docket No. 87-268, *Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking*, FCC 07-138, 22 FCC Rcd 15581 (rel. Aug. 6, 2007).

**ENGINEERING STATEMENT
IN SUPPORT OF A PETITION FOR
RECONSIDERATION OF THE
SEVENTH REPORT AND ORDER
KWWL TELEVISION, INC
KWWL CHANNEL 7 WATERLOO, IA**

INTRODUCTION

This statement was prepared on behalf of KWWL Television, Inc., licensee of television broadcast station KWWL in Waterloo, Iowa. It provides technical information in support of a petition for reconsideration of the Seventh Report and Order, FCC 07-138, with specific reference to the technical facilities approved for KWWL in Appendix B, the new DTV Table of Allotments.

BACKGROUND

In the original DTV Table of Allotments, Appendix B of the Sixth Report and Order, adopted February 17, 1998 the Channel 7 NTSC operation of KWWL was paired with Channel 55 for digital service during the transition to digital television service. The parameters proposed for KWWL on digital Channel 55 were 1000 kW at 604 meters HAAT.

In 1999, under former ownership, KWWL filed an application for construction permit, BPCDT-19991025AEH specifying the technical parameters of 1000 kW at 574 meters HAAT. That application was granted December 8, 1999. In 2002, under the same ownership, KWWL filed an application, BMPCDT-20020313AAP proposing to modify BPCDT-19991025AEH by reducing ERP from 1000 kW to 194 kW and reducing HAAT from 574 meters to 527 meters. An application for license, BLCDDT-20020422AAG, to cover BMPCDT-20020313AAP was filed and subsequently granted on October 28, 2002.

The former licensee certified on FCC Form 381 on November 4, 2004 to neither replicate or maximize KWWL and selected to operate post transition with the facilities licensed in BLCDT- 20020422AAG. On January 19, 2005 the former licensee elected Channel 7 on FCC Form 382 for KWWL's post-transition DTV operation. That selection was tentatively approved by the Commission on June 23, 2005.

PROPOSAL FOR RECONSIDERATION

The actions taken on behalf of KWWL, described in the preceding section of this statement have resulted in post transition facilities that are severely limited when compared with the technical facilities allotted to KWWL in the original DTV Table of Allotments, Appendix B of the Sixth Report and Order. The allotted technical parameters of 1000 kW at 604 meters HAAT were calculated by the Commission to provide KWWL with operating facilities that would essentially replicate the service area of the KWWL NTSC operation on Channel 7. The former licensee opted to neither replicate or maximize KWWL and selected the limited licensed facilities of 194 kW at 527 meters HAAT on Channel 55 for operation during the transition and elected Channel 7 for final DTV operation. The Commission calculated facilities for operation on Channel 7 that would essentially replicate the noise limited service of KWWL's transition Channel 55 operation as licensed in BLCDT 20020422AAG. Those facilities 3.2 kW at 527 meters HAAT are described in the new Appendix B of the Seventh Report and Order.

As previously stated the new Appendix B facilities will severely limit KWWL's ability to provide noise limited service to areas that would be served with the facilities allotted in the original Appendix B from the Sixth Report and Order, which were calculated to essentially replicate the KWWL NTSC Grade B service area. Attached as Figure 1 is a map showing the 36 dBu contour of a post transition Channel 7 operation for KWWL based on the technical parameters designated in Appendix B of the Seventh Report and Order. The map also shows the 36 dBu contour of a Channel 7 post transition operation based on the Tech Box facilities described on Figure 2 attached to this statement. The office of the undersigned has conducted interference studies based on the parameters described in the Tech Box and found the proposal to

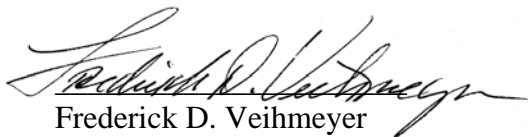
be in full compliance with the Commission's interference criteria as summarized in the interference analysis attached as Figure 4.

The noise limited service contours shown on the map of Figure 1 clearly demonstrate the limitations placed on KWWL for post transition operation. There are significant areas that will be void of noise limited service from KWWL if the station is limited to the facilities described in Appendix B of the Seventh Report and Order. In addition KWWL is a NBC network affiliate and in some areas will provide the only network service post transition. A map showing the NBC network service is attached as Figure 3.

CONCLUSION

Since the technical parameters described in Figure 2 can be fully implemented in compliance with the Commission's interference criteria and the loss of post transition digital television service can be avoided , it is respectfully requested on behalf of KWWL Television, Inc. that Appendix B of the Seventh Report and Order be revised to specify the technical parameters described on Figure 2 of this statement for the post transition operation of KWWL.

Respectfully Submitted,
LOHNES AND CULVER



Frederick D. Veihmeyer

October 2007

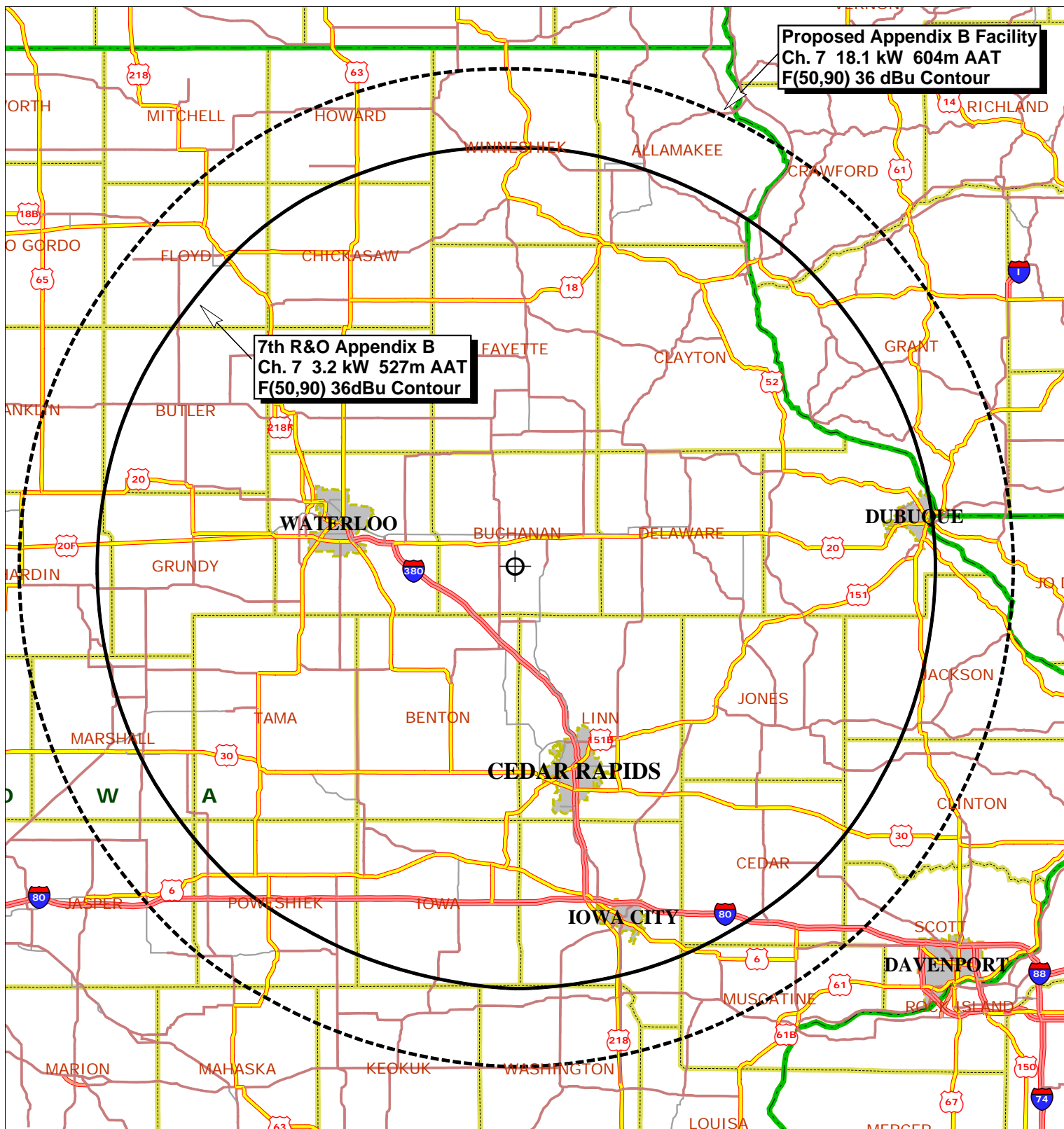





FIGURE 1 DTV CONTOURS
KWWL CHANNEL 7 WATERLOO, IA

 Appendix B 36 dBu Contour
 Proposed 36 dBu Contour
 Transmitter Location

0 10 20 30
Kilometers

Prepared by Lohnes & Culver, Laurel, MD, 10/2007

FIGURE 2

RE: PETITION FOR CONSIDERATION OF 7TH R&O, FCC 07-138

KWVL TELEVISION, INC.

TECHNICAL SPECIFICATIONS:

KWVL WATERLOO, IA - FAC ID 593

TECH BOX

1. Channel Number: **7** Proposed post-transition DTV facilities based on: Allotted Replication Facilities

2. Zone: ☐ I ☒ II ☐ III

3. Antenna Location Coordinates: (NAD 27)

$\frac{42}{91}^{\circ}$ $\frac{24}{50}'$ $\frac{04}{43}''$ ☒ N ☐ S Latitude
☐ E ☒ W Longitude

4. Antenna Location Site Elevation Above Mean Sea Level: 298.7 meters

5. Overall Tower Height Above Ground Level: 319 meters

6. Height of Radiation Center Above Ground Level: 588 meters

7. Height of Radiation Center Above Average Terrain: 604 meters

8. Maximum Effective Radiated Power (average power): **18.1** kW

9. Directional Antenna Relative Field Values:

[illegible]

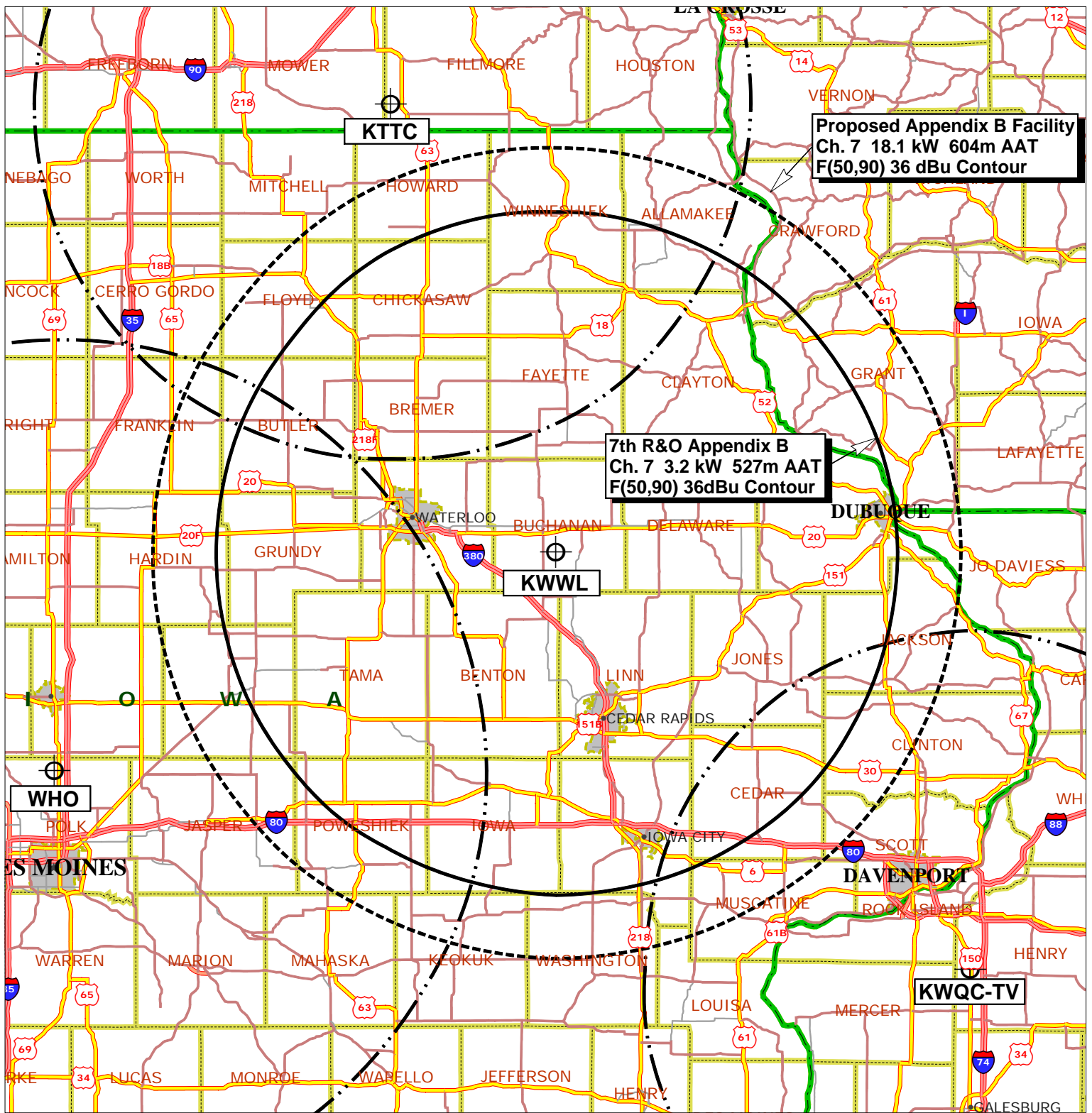


FIGURE 3 NBC AFFILIATES
KWWL CHANNEL 7 WATERLOO, IA

- Appendix B 36 dBu Contour
- Proposed 36 dBu Contour
- Other NBC Affiliates
- Transmitter Location

0 20 40 60
Kilometers

Prepared by Lohnes & Culver, Laurel, MD, 10/2007

FIGURE 4
INTERFERENCE ANALYSIS SUMMARY
KWWL 18.1KW 604 M HAAT
7A IA WATERLOO

AFFECTED STATIONS	7N IA WATERLOO BLCT-19840412KF IX TO APPENDIX B	7A IA WATERLOO REPLICATION FACILITY IX TO APPENDIX B
Results for: 7A IL CHICAGO		
HAAT 515.0 m, ERP 3.2 kW		
Population within NL Contour	9,456,218	9,456,218
not affected by terrain losses	9,452,677	9,452,677
lost to NTSC IX	24,599	0
lost to additional IX by digital TCD(s)	38,398	58,982
lost to IX by digital TCD(s) only	58,824	58,982
lost to all IX	62,997	58,982
Percentage of received IX	0.67%	0.62%
Results for: 7A MO HANNIBAL		
HAAT 271.0 m, ERP 13.6 kW		
Population within NL Contour	312,650	312,650
not affected by terrain losses	309,936	309,936
lost to NTSC IX	1,007	0
lost to additional IX by digital TCD(s)	9	541
lost to IX by digital TCD(s) only	27	541
lost to all IX	1,016	541
Percentage of received IX	0.33%	0.17%
Results for: 7A MO ST. JOSEPH		
HAAT 247.0 m, ERP 7.5 kW		
Population within NL Contour	1,037,272	1,037,272
not affected by terrain losses	978,545	978,545
lost to NTSC IX	35	0
lost to additional IX by digital TCD(s)	25,603	25,625
lost to IX by digital TCD(s) only	25,625	25,625
lost to all IX	25,638	25,625
Percentage of received IX	2.62%	2.62%
Results for: 7A WI WAUSAU		
HAAT 369.0 m, ERP 16.9 kW		
Population within NL Contour	539,813	539,813
not affected by terrain losses	531,651	531,651
lost to NTSC IX	4,036	0
lost to additional IX by digital TCD(s)	23	1,438
lost to IX by digital TCD(s) only	216	1,438
lost to all IX	4,059	1,438
Percentage of received IX	0.76%	0.27%
Results for: 8A IA DES MOINES		
HAAT 566.0 m, ERP 29.4 kW		
Population within NL Contour	10,011,467	1,001,467
not affected by terrain losses	996,431	996,431
lost to NTSC IX	422	0
lost to additional IX by digital TCD(s)	12,588	13,010
lost to IX by digital TCD(s) only	13,010	13,010
lost to all IX	13,010	13,010
Percentage of received IX	1.31%	1.31%
Results for: 8A WI LA CROSSE		
HAAT 462.0 m, ERP 20.3 kW		
Population within NL Contour	767,482	767,482
not affected by terrain losses	732,030	732,030
lost to NTSC IX	0	0
lost to additional IX by digital TCD(s)	18,021	18,021
lost to IX by digital TCD(s) only	18,021	18,021
lost to all IX	18,021	18,021
Percentage of received IX	2.46%	2.46%